

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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USDC SDNY
DOCUMENT
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DOC #: _____
DATE FILED: _____
11/9/2021

THE UNITED STATES OF AMERICA,

-against-

S4 19-CR-00789 (PGG)-2

JELANI WRAY,

ORDER

Defendant.

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SARAH NETBURN, United States Magistrate Judge:

The Superseding Information at ECF No. 538 was filed in error. The Clerk of Court is respectfully directed to refile the attached correct version, *nunc pro tunc*.

**SO ORDERED.**

  
SARAH NETBURN  
United States Magistrate Judge

DATED: November 9, 2021  
New York, New York

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : **SUPERSEDING INFORMATION**  
:  
- v. - : S4 19 Cr. 789  
:  
JELANI WRAY, :  
a/k/a "Lani," :  
a/k/a "J.R." :  
Defendant. :  
X  
- - - - -

**COUNT ONE**

**(Payments of Bribes and Gratuities To An  
Agent of A Federally Funded Organization)**

The United States Attorney charges:

1. From in or about 2013, up to and including in or about 2019, in the Southern District of New York and elsewhere, JELANI WRAY, a/k/a "Lani," a/k/a "J.R.," the defendant, corruptly did give, offer, and agree to give a thing of value to a person, with intent to influence and reward agents of organizations and a local government agency, in connection with business, transactions, and series of transactions of such organization involving a thing of value of \$5,000 and more, while such organization was in receipt of, in any one-year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, to wit, WRAY bribed at least five employees of the New York City

Police Department ("NYPD") and caused bribes to be paid to hospital personnel (collectively, the "lead sources"), in return for the lead sources' improperly disclosing confidential information concerning motor vehicle accident victims, valued in excess of \$5,000, obtained during the discharge of their official responsibilities, and whose organizations and local government agencies received in excess of \$10,000 in federal funds annually.

(Title 18, United States Code, Sections 666(a)(2) and 2.)

**FORFEITURE ALLEGATION**

2. As a result of committing the offenses alleged in Count One, JELANI WRAY, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

**Substitute Assets Provision**

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third person; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

*Audrey Strauss*  
AUDREY STRAUSS  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

**JELANI WRAY,**

**Defendant.**

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**SUPERSEDING INFORMATION**

S4 19 Cr. 789  
(18 U.S.C. § 666 and 2.)

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AUDREY STRAUSS  
United States Attorney.

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